

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
APMU WITNESS HALDI
(USPS/APMU-T1-29-33)

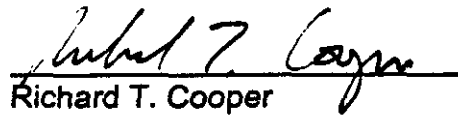
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to APMU witness Haldi: USPS/APMU-T1-29-33.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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(202) 268-2993 Fax -5402
June 19, 2000

USPS/APMU-T1-29. Does your proposal exclude pieces 5 pounds and under from eligibility for your proposed "Discount for destination SCF delivery of Priority Mail"? If so, do you believe this might result in any potential rate anomalies? Please explain.

USPS/APMU-T1-30. Please confirm that some portion of Priority Mail currently destines as firm hold-outs or in P.O. Boxes and receives no rate discount. If not confirmed, please explain fully.

USPS/APMU-T1-31. Please refer to the rules regarding DSCF Parcel Post dropship in Section 650 of the DMM (Domestic Mail Manual) Quick Service Guide.

a. Do you intend for these preparation requirements to be applicable to the Priority Mail pieces in your discount for destination SCF delivery proposal?


b. If anything other than an unqualified yes, please explain how you expect the costs of DSCF Parcel Post that you use as a proxy in your analysis will be consistent with the actual costs resulting from your proposal.

USPS/APMU-T1-32. Do you intend for the various Standard Mail (A) preparation requirements presented in the DMM to be fully applicable to the pieces inside the Priority Mail sacks in your proposal? If your answer is no, could this create additional costs not associated with other Standard Mail (A) nonletter pieces?

USPS/APMU-T1-33. Please provide flow models and/or a verbal description of exactly how, under your proposal, SCF Priority Mail would be handled operationally in Postal Service plants, on a nationally representative scale if possible. Please quantify the additional costs associated with these handlings, preferably on a nationally representative scale.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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